

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**NATHANIEL MYRICK**

Plaintiff,

v.

**MIDLAND FUNDING, LLC**

Defendant.

**Civil Action No.**

**NOTICE OF REMOVAL**

**To: Clerk - United States District Court for the  
District of Maryland, Southern Division**

**PLEASE TAKE NOTICE THAT**, on this date, Defendant Midland Funding, LLC ("Midland"), pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1331, hereby removes the above captioned matter to this Court from the District Court of Maryland for Prince George's County. In support thereof, Midland avers as follows:

1. On or about March 6, 2012, Plaintiff filed a Complaint<sup>1</sup> in the District Court of Maryland for Prince George's County, at case number 050200067782012. (A true and correct copy of Plaintiff's Complaint is attached hereto and marked as Exhibit "A").

2. Midland was served with Plaintiff's Complaint on March 20, 2012.

3. Plaintiff's Complaint alleges that Midland violated the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, et seq. by calling his residence in connection with a debt.

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<sup>1</sup> In his Complaint, Plaintiff refers to exhibits purportedly attached to his Complaint. The Complaint served upon Midland Funding contained no exhibits. The undersigned has requested copies of these documents from the Clerk of Courts for the District Court of Maryland for Prince George's County and will file them with the Court immediately upon receipt.

4. Based on the foregoing, Midland has timely filed this Notice of Removal within thirty days of being served with the Complaint and within thirty days of the date that the Action was first removable. See 28 U.S.C. § 1446(b).

5. The current action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Midland pursuant to the provisions of 28 U.S.C. § 1441(b), in that Plaintiff has alleged that Midland violated the Fair Debt Collections Practices Act, 15 U.S.C. § 1692, et seq., thereby asserting claims that arise under federal law.

6. In that the cause of action alleged by Plaintiff arises from the performance of obligations of the parties within Prince George's County, Maryland, the United States District Court for the District of Maryland, Southern Division, should be assigned the Action.

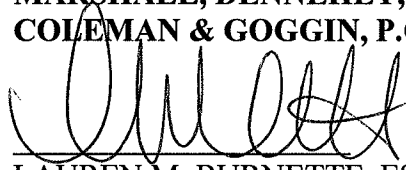
7. Midland, upon filing this Notice of Removal in the office of the Clerk of the United States District Court for the District of Maryland, Southern Division, has also caused to be filed copies of this Notice with the Clerk of Court for the District Court of Maryland for Prince George's County to effect removal of this action pursuant to §1446(d).

**WHEREFORE**, Midland Funding, LLC. hereby notifies this Honorable Court that this action is removed from the District Court of Maryland for Prince George's County to the United States District Court for the District of Maryland, Southern Division, pursuant to the provisions of 28 U.S.C. §§1331, and 1446.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN, P.C.**

By:



LAUREN M. BURNETTE, ESQUIRE  
Attorney No. 29597  
4200 Crums Mill Road, Suite B  
Harrisburg, PA 17112  
(717) 651-3703  
[lmburnette@mdwecg.com](mailto:lmburnette@mdwecg.com)  
Attorneys for Defendant  
Midland Funding, LLC

Dated: April 9, 2012